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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC. a Colorado
corporation; ORACLE AMERICA,
INC., a Delaware corporation; and
ORACLE INTERNATIONAL
CORPORATION, a California
corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada
corporation; SETH RAVIN, an
individual

Defendants.

Case No. 2: 10-cv-0106-LRH-PAL

**DECLARATION OF KEVIN M. PAPAY IN
SUPPORT OF PLAINTIFFS' MOTION TO
MODIFY PROTECTIVE ORDER**

1 I, Kevin M. Papay, declare as follows:

2 1. I am member of the State Bar of California and an associate at Bingham
3 McCutchen LLP, counsel of record for Plaintiffs Oracle USA, Inc., Oracle America, Inc. and
4 Oracle International Corporation (collectively, "Oracle") in this action. I have personal
5 knowledge of the matters stated in this declaration by virtue of my representation of Oracle in
6 this action. If called and sworn as a witness, I could and would competently testify as to such
7 matters.

8 2. Attached as **Exhibit A** is a true and correct copy of the transcript of the July 3,
9 2012 Motion Hearing before the Honorable Peggy A. Leen.

10 3. Attached as **Exhibit B** is a true and correct copy of Oracle's complaint against
11 CedarCrestone, Inc., which was filed in the Northern District of California on September 5,
12 2012.

13 4. Attached as **Exhibit C** is a true and correct copy of Oracle's Subpoena to Produce
14 Documents, Information, or Objects Or To Permit Inspection Of Premises, addressed to
15 CedarCrestone.

16 5. Attached as **Exhibit D** is a true and correct copy of a stipulation, dated July 19,
17 2011, entered into by Oracle, CedarCrestone, and defendant Rimini Street, Inc.

18 6. Attached as **Exhibit E** is a true and correct copy of the December 1, 2011
19 deposition of CedarCrestone's corporate representative, Paul Simmons. We have provided
20 boxing where possible to further assist in identifying the information relevant to Oracle's motion.

21 7. Attached as **Exhibit F** is a true and correct copy of Oracle Deposition Exhibit
22 1301, which was introduced during the December 1, 2011 deposition of CedarCrestone's
23 corporate representative, Paul Simmons.

24 8. Attached as **Exhibit G** is a true and correct copy of Oracle Deposition Exhibit
25 1304, which was introduced during the December 1, 2011 deposition of CedarCrestone's
26 corporate representative, Paul Simmons.

27 9. Attached as **Exhibit H** is a true and correct copy of Oracle Deposition Exhibit
28 1305, which was introduced during the December 1, 2011 deposition of CedarCrestone's

1 corporate representative, Paul Simmons.

2 10. Attached as **Exhibit I** is a true and correct copy of Oracle Deposition Exhibit
3 1307, which was introduced during the December 1, 2011 deposition of CedarCrestone's
4 corporate representative, Paul Simmons.

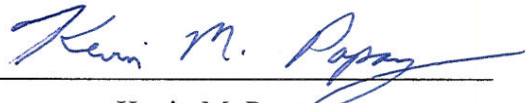
5 11. Attached as **Exhibit J** is a true and correct copy of Oracle Deposition Exhibit
6 1303, which was introduced during the December 1, 2011 deposition of CedarCrestone's
7 corporate representative, Paul Simmons.

8 12. Attached as **Exhibit K** is a true and correct copy of Oracle Deposition Exhibit
9 1308, which was introduced during the December 1, 2011 deposition of CedarCrestone's
10 corporate representative, Paul Simmons.

11 13. Attached as **Exhibit L** is a true and correct copy of Oracle Deposition Exhibit
12 1323, which was introduced during the December 1, 2011 deposition of CedarCrestone's
13 corporate representative, Paul Simmons.

14 14. Attached as **Exhibit M** is a true and correct copy of Oracle Deposition Exhibit
15 1324, which was introduced during the December 1, 2011 deposition of CedarCrestone's
16 corporate representative, Paul Simmons.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed
18 in San Francisco, California, on September 7, 2012.

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22 Kevin M. Papay
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